

**EXHIBIT A**

**PROPOSED ORDER**

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF IOWA

In re:	)	Chapter 11
	)	
MERCY HOSPITAL, IOWA CITY,	)	Case No. 23-00623 (TJC)
IOWA, <i>et al.</i>	)	
	)	(Jointly Administered)
Debtors.	)	
	)	

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**[PROPOSED] ORDER GRANTING MERCY HEALTH NETWORK, INC.’S  
EXPEDITED MOTION FOR ENTRY OF AN ORDER SETTING MOTION TO EXTEND  
DEADLINE TO PRODUCE RESPONSIVE DOCUMENTS  
AND COMMUNICATIONS TO THE OC**

This matter came before the Court upon the *Expedited Motion for Entry of an Order Setting the Motion to Extend the Deadline to Produce Responsive Documents and Communications to the OC* (the “Motion”) filed by Mercy Health Network, Inc. d/b/a MercyOne (“MercyOne”);<sup>2</sup> and the Court having found it has subject matter jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; and it appearing that venue in this district is proper pursuant to 28 U.S.C. § 1409; and the Court having found that the relief requested in the Motion is in the best interests of the Debtor, its creditors, and other parties in interest; and the Court having found that MercyOne provided adequate and appropriate notice of the Motion under the circumstances and that no other or further notice is required; and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein:

IT IS THEREFORE ORDERED, ADJUDGED, AND DECREED as follows:

1. The Motion is GRANTED as set forth herein.

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<sup>2</sup> All capitalized terms not defined herein shall have the meanings affixed to them in the Motion.

2. The Court finds that good cause existed for the reasons set forth in the Motion to schedule the Extension Motion for a hearing on an expedited basis.

3. The Extension Motion shall be heard and considered at the hearing set for May 9, 2025 at 2:00 p.m.

4. This Court retains jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Dated and entered this \_\_\_\_\_ day of May, 2025.

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Honorable Thad J. Collins, Chief Judge

**Prepared and submitted by:**

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